

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Baltimore Division**

In Re: John F. Cordwell dba Advance Realty
Group and Dorothy J. Cordwell dba
Advance Realty Group

Case No. 14-23828-DER
Chapter 7

Nationstar Mortgage, LLC, Movant (Cenlar,
FSB, Servicer)
vs.

John F. Cordwell dba Advance Realty Group
and Dorothy J. Cordwell dba Advance Realty
Group, Debtors
Sean C Logan, Esq., Trustee
Respondent(s)

**MOTION FOR RELIEF FROM AUTOMATIC STAY
Real Property at 22 Elray Road, Kingsville, Maryland 21087**

Comes now Nationstar Mortgage, LLC, Movant (Cenlar, FSB, Servicer) herein, by Kyle J. Moulding, Esq., its attorney and respectfully represents:

1. This Motion is filed pursuant to 11 U.S.C. Sec. 362 d through f, and 28 U.S.C. Section 1334 and Section 157, giving this Court jurisdiction to grant relief from the Automatic Stay for cause and/or to prevent irreparable damage to the interest of a secured creditor in the property of the Debtors.

2. The current amount due to the Movant is approximately \$354,005.68, which includes: a principal balance in the amount of \$339,481.71; interest in the amount of \$12,051.61 through March 3, 2015; bankruptcy fees and costs in the amount of \$926.00; accumulated late charges in the amount of \$676.14; an escrow deficit in the amount of \$785.22; a recoverable balance in the amount of \$35.00; and other total fees in the amount of \$50.00. Additionally, pursuant to the Debtor(s) schedules, the property is encumbered by a lien securing Chase in the amount of \$37,532.14.

3. The Debtors have failed to pay the payment(s) for the months of September 2014 to March 2015, so that the arrears are \$20,958.04, which include: payment(s) in the amount(s) of \$2,754.82 for the months of September 2014 through December 2014 per month, and \$2,750.54 for the months of January 2015 through March 2015 per month; current bankruptcy fees and costs in the amount of \$926.00; accumulated late charges in the amount of \$676.14; total fees in the amount of \$50.00; and a recoverable balance in the amount of \$35.00. The current monthly payment is \$2,750.54.

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4. The Movant is inadequately protected by the Debtor(s) failure to make the payments which may include an escrow for taxes and insurance.

5. In his/her Schedules, the Debtor(s) list(s) a current market value of \$398,000.00 for the real property.

6. Therefore, cause exists to grant relief from stay. Movant lacks adequate protection and continues to be irreparably harmed by the continuation of the Stay of 11 U.S.C. Sections 362(a) and 1301, if applicable.

NOTICE OF INTENT TO SUBMIT BUSINESS RECORDS

Creditor will submit business records as evidence at any scheduled hearing, as allowed under Fed. R. Bankr. P. 9017 and FRE 902(11). These business records are available for inspection by the adverse party upon demand.

7. The Movant is the holder of a Note secured by a Deed of Trust dated December 3, 2007, and recorded among the land records of Baltimore County, Maryland, and which encumbers the property of the Debtors at 22 Elray Road, Kingsville, Maryland 21087.

WHEREFORE, the Movant prays this Honorable Court to issue an Order

1. Lifting the Automatic Stay as to the Debtor's property at 22 Elray Road, Kingsville, Maryland 21087, so that the Movant can proceed with the foreclosure of its Deed of Trust; or alternatively

2. For such other and further relief as the Court deems appropriate.

/s/ Kyle J. Moulding, Esq. (kmg)
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed, first class, postage prepaid, on March 9, 2015, to John F. Cordwell dba Advance Realty Group at 22 Elray Road, Kingsville, Maryland 21087 and Dorothy J. Cordwell dba Advance Realty Group at 22 Elray Road, Kingsville, Maryland 21087. Copies were sent electronically via the CM/ECF system to Donald Dunbar, Esq., Attorney for Debtors and Sean C Logan, Esq., Trustee.

/s/Kyle J. Moulding, Esq.